

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

Court File No. 16-cv-1054 (WMW/DTS)

**DECLARATION OF RAMESH
PANDEY IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Ramesh Pandey, declare as follows:

1. I am Vice President, Head of Architecture Shared Services, and in this role, I am familiar with the software applications and technologies used by Federal Insurance Company ("Federal") in the course of its business and the components of each such application or technology.

2. Blaze Advisor is a business rules management system ("BRMS"). Federal integrates Blaze Advisor into larger software applications to help those applications make automated decisions.

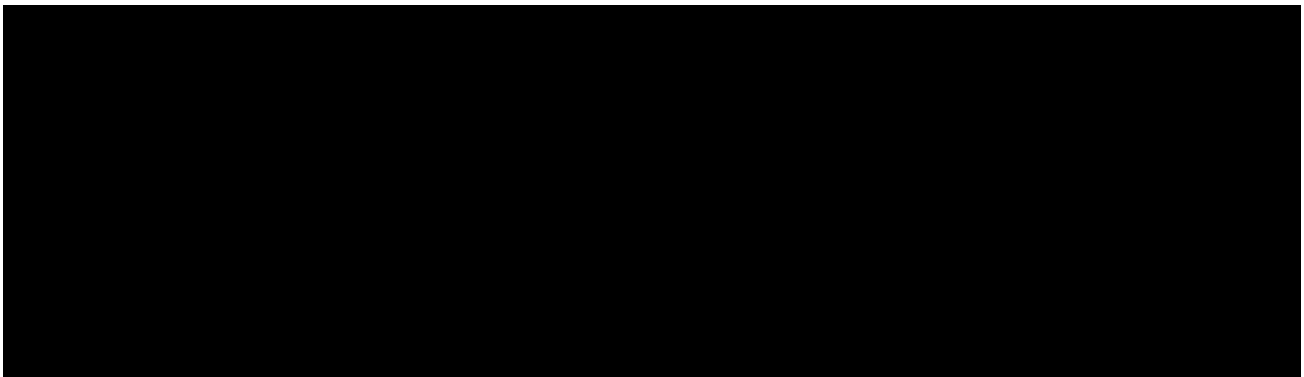
3. Attached as Exhibit A are documents Bates labeled FED017917_0001-0007.

4. Blaze is an exceedingly minor piece of the business operations at Federal. For example, as reflected in the attached Exhibit A, Blaze is one of approximately twenty

third-party technologies that make up just one of Federal's proprietary applications called CSI eXPRESS. CSI eXPRESS, in turn, is just one of approximately 1,500 software applications that Federal uses. Of these 1,500 applications, approximately ten have utilized Blaze at any time since Federal purchased the License.

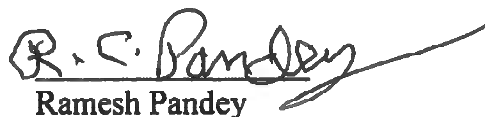
5. Prior to the merger of The Chubb Corporation with ACE Limited on January 15, 2016, Federal and its affiliates Chubb Insurance Company of Europe SE, Chubb Insurance Company of Australia Ltd., and Chubb Insurance Company of Canada were using Blaze as a component in ten software applications.

6. Immediately after the merger, Federal and its affiliates Chubb Insurance Company of Europe SE, Chubb Insurance Company of Australia Ltd., and Chubb Insurance Company of Canada continued to use Blaze as a component in the same ten software applications as they had pre-merger. Subsequently, two applications – EZER and Adapt – were decommissioned.



I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: July 26, 2019


Ramesh Pandey